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Part C
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July 25, 2012

Project 106270030

Carmen D. Santos
RCRA Corrective Action Office
Waste Management Division
U.S. EPA Region 9
Mail Code WST-4
75 Hawthorne Street
San Francisco, California 94105

Re: Polychlorinated Biphenyls – U.S. EPA Conditional Approval Under 40 CFR 761.61c, Toxic Substances Control Act – "*Polychlorinated Biphenyls Notification Plan Former Pechiney Cast Plate, Inc Facility, Vernon, California*" July 9, 2009

Dear Ms. Santos:

As a follow up to our July 22, 2012 electronic mail submittal, please find attached a hard copy of the additional post excavation sampling approach ("*Verification Samples Beneath Completed Excavations*"). The sampling approach was submitted pursuant to the U.S. Environmental Protection Agency's conditional approval letter[1] for the former Pechiney Cast Plate Facility as outlined in Condition A.2.a.

Please give me a call to discuss, or if you need any additional information.

Sincerely yours,
AMEC Environment & Infrastructure

Linda Conlan

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[1] U.S. EPA, July 1, 2011, Polychlorinated Biphenyls – U.S. EPA Conditional Approval Under 40 C FR 761.61(c) Toxic Substances Control Act – "Polychlorinated Biphenyls Notification Plan, Former Pechiney Cast Plate, Inc. Facility, Vernon, California

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Verification Samples Beneath Completed Excavations

As required by U.S EPA in its July 1, 2011 conditional approval letter under Condition A.2.a, a revised post excavation cleanup verification sampling approach to meet the proposed cleanup levels by depth is outline below for the polychlorinated biphenyl (PCB) soil excavation activities.

Following the completion of each PCB soil excavation area outlined in the Remedial Action Plan (RAP) and the initial verification samples have been collected from the base of the excavation and side walls as described in Section 2.3 [*Soil Verification Sampling (PCBs)*] of the draft Sampling and Analysis Plan[1] (SAP), additional verification soil samples will be collected below the base of the completed excavation to confirm that the concentrations of PCBs (total Aroclors) remaining in the upper 5 feet or between 5 to 15 feet from the top of ground surface do not exceed 3.5 milligrams per kilogram (mg/kg) (2.0 mg/kg for Aroclor-1254) and 23 mg/kg (2.0 mg/kg for Aroclor-1254), respectively.

The number of the samples and sample depths for the additional verification samples from beneath the base of the completed PCB-impacted soil excavations will be dependent on the final depth of each excavation and will be determined in the field using the methods outlined in Section 2.4 of the draft SAP. For purposes of the additional verification sampling, the excavations have been grouped into two categories (1) "shallow" excavations with a final excavation base depth between 1 and 5 feet below ground surface (bgs); and "deeper" excavations with a final excavation base depth between 5 and 15 feet bgs. The following sections describe additional soil verification sampling for "shallow" and "deeper" excavations.

Additional Verification Samples for Shallow Excavations (Base Between 1 and 5 feet bgs)

At the conclusion of the excavation of PCB-impacted soil from shallow excavations, additional verification soil samples will be collected to verify that concentrations of PCBs (total Aroclors) remaining in the upper 5 feet from the top of ground surface does not exceed 3.5 mg/kg (2.0 mg/kg for Aroclor-1254). The additional verification soil samples will be collected below the base of the excavation to a depth of 5 feet bgs using either a hand auger or directly from the backhoe bucket of the excavating equipment. The sampling method will be determined in the field based on excavation access and site safety requirements for excavation sampling. These soil samples will be collected at 1 to 2-foot intervals starting from the base of the completed excavation to a total depth of 5 feet bgs.

[1] AMEC, 2011, Concrete and Soil Sampling and Analysis Plan, Former Pechiney Cast Plate, Inc. Facility, 3200 Fruitland Avenue, Vernon, California, July 27.

Additional Verification Samples from Deeper Excavations (Base Between 5 to 15 feet bgs)

At the conclusion of the excavation of PCB-impacted soil from deeper excavations, additional verification soil samples will be collected to verify that concentrations of PCBs (total Aroclors) remaining in the upper 5 to 15 feet from the top of ground surface does not exceed 23 mg/kg (2.0 mg/kg for Aroclor-1254). The additional verification samples will be collected below the base of the excavation to a depth of 15 feet bgs using either a hand auger or directly from the backhoe bucket of the excavating equipment. The sampling method will be determined in the field based on excavation access and site safety requirements for the excavation sampling. Soil samples will be collected at 1 to 2-foot intervals starting from the base of the completed excavation to a total depth of 15 feet bgs.

Laboratory Analyses

For the shallow and deep excavations, soil samples collected at shallower depths will be analyzed first, and deeper samples will be placed on hold pending laboratory analysis of the shallower samples. If PCB concentrations detected in the shallower samples do not exceed the respective remediation goal for each respective soil depth interval, then the additional deeper samples at that location will be analyzed to confirm that the PCB concentrations to a maximum depth of either shallow excavations or deeper excavations do not exceed the aforementioned remediation goals. If the concentrations of PCBs in soil are detected above the established remediation goals, then additional soil will be excavated until the results indicate that the concentrations of PCBs no longer exceed the established limits for the respective soil interval.

The soil samples will be analyzed under 24- to 48-hour turnaround to support the demolition activities and will be analyzed for PCBs using EPA Method 8082.